

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ContentGuard Holdings, Inc.,

Plaintiff,

v.

Amazon.com, Inc., *et al*,

Defendants.

Civil Action No. 2:13-cv-01112 (JRG)

JURY TRIAL DEMANDED

JOINT NOTICE

Pursuant to the Court's July 2, 2015 Order (Dkt. 710), Plaintiff ContentGuard Holdings, Inc. and Defendants Huawei Device USA, Inc.; Huawei Technologies Co. Ltd.; Motorola Mobility LLC; HTC Corporation and HTC America, Inc. ("Moving Defendants") jointly file this Notice. The tables below list the pending motions joined by any of the Moving Defendants and status of each motion as agreed upon by ContentGuard and Moving Defendants. Further, based on the Court's request at the July 1, 2015 hearing to streamline the pending *Daubert* motions, Defendants have filed consolidated motions that combine, streamline, and replace many of the separate *Daubert* motions filed by various Defendants on June 26, 2015. Thus, the tables below also list whether any pending motion filed or joined by a Moving Defendant corresponds to a consolidated motion filed on July 8 or 9, 2015.

Google Dkt. No.	Date	Movant	Pending Motion	Status
232	6/26/2015	Google (joined by Huawei, HTC, Motorola, and Samsung in the <i>Amazon</i> case; see D.I. 665, 668, 687, 691)	Defendant Google Inc.'s Motion to Strike Portions of the Expert Reports of Michael T. Goodrich and David Martin that Contradict the Court's Claim Construction Opinion and Order	Not Stayed; consolidated into D.I. 721

Amazon Dkt. No.	Date	Movant	Pending Motion	Status
670	6/26/2015	Huawei	Huawei Defendants' Motion to Exclude Expert Opinions of Dr. David Teece for Failing to Calculate Damages Using a Smallest Salable Unit	Stayed; consolidated into D.I. 723 (Section I.F)
676	6/26/2015	HTC	Defendant HTC Corporation and HTC America, Inc.'s Motion for Judgment on the Pleadings for ContentGuard's Failure to State a Claim Upon Which Relief Can Be Granted Against HTC With Regard to the '859 Patent	Stayed
677	6/26/2015	Huawei Samsung HTC	Defendants' Motion to Exclude Testimony of Plaintiff's Infringement Expert Michael T. Goodrich Regarding Indirect Infringement	Not Stayed; consolidated into D.I. 721 (Section V)
682	6/26/2015	Amazon HTC (joinder filed at D.I. 693)	Amazon's Motion to Exclude The Testimony of Dr. Teece, Dr. Danaher, and Dr. Prince	Not Stayed; consolidated into D.I. 723
686	6/26/2015	ContentGuard	Plaintiff ContentGuard Holdings, Inc.'s <i>Daubert</i> Motion to Exclude Portions of the Report and Testimony of Dr. John Phillip Mellor	Stayed

689	6/26/2015	Amazon Apple HTC Huawei Motorola Samsung	Defendants' Motion for Summary Judgment Limiting ContentGuard's Pre-Suit Damages for Failure to Comply with the Constructive Notice Requirement of 35 U.S.C. § 287	Not Stayed
695	6/26/2015	Google Samsung Motorola HTC Huawei	Google and Android Device Defendants' Motion to Exclude Jeffrey Prince Expert Opinion Testimony Pursuant to Federal Rule of Evidence 702	Not Stayed; consolidated into D.I. 723
700	6/26/2015	Google Samsung Motorola HTC Huawei	Google and Android Device Defendants' Motion to Exclude Brett Danaher's Expert Opinion Testimony Pursuant to Federal Rule of Evidence 702	Not Stayed; consolidated into D.I. 723
701	6/29/2015	Google Samsung Motorola HTC Huawei	Google and Android Device Defendants' Motion to Exclude David Teece Expert Opinion Testimony Pursuant to Federal Rule of Evidence 702	Not Stayed; consolidated into D.I. 723
719	7/3/2015	Google Motorola Amazon Apple Huawei HTC Samsung	Defendants' Supplemental Brief in Support of Defendants' Joint Renewed Motion for Judgment of the Pleadings Declaring All Asserted Patent Claims Invalid Pursuant to 35 U.S.C. § 101	Not Stayed
721	7/8/2015	Google Motorola Apple Huawei HTC Samsung	Defendants' Combined Motion to Strike Portions of the Expert Reports and Testimony of Michael T. Goodrich and David Martin	Not Stayed
723	7/9/2015	Google Motorola Apple Amazon Huawei HTC Samsung	Defendants' Joint Motion to Exclude the Testimony of Dr. Teece, Dr. Danaher & Dr. Prince	Not Stayed (except Section I.F)

Dated: July 9, 2015

Respectfully submitted,

/s/ Sam Baxter (with permission)

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic services on July 9, 2015. Local Rule CV-5(a)(3)(A).

/s/ Terry D. Garnett

Terry D. Garnett